



USDA Forest Service
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October 20, 2002

This letter is a Notice of Appeal filed pursuant to 36 CFR, part 217, page 46 in the Record of Decision.

The decision we are appealing is the Preferred Alternative as described in the FEIS and the resulting Revised Forest Plan, specifically areas available for motorized and non-motorized winter activities, with modifications as further described in the ROD, as stated on page 3 of the ROD.

The document in which the decision is contained is the Revision Land and Resource Management Plan of the Chugach National Forest Record of Decision, R10 MB-480b. The date of the decision was May 31, 2002 and the deciding officer is Regional Forester Dennis Bschor.

The specific portions of the document to which we object are as follows:

1. The areas closed for winter motorized use for the entire winter in the final decision are not shown in any of the alternatives or in the Draft Preferred Alternative that the public reviewed. The decision is to close four major popular snowmobiling areas (Lower Russian Lakes, entire area around Tern Lake, area north of Summit Lake, Cater and Crescent Lakes) all winter to winter motorized use. The record of decision states (page 29) "The Preferred alternative was constructed primarily by considering Alternatives A through F of the DEIS and combining components of each". None of the alternatives or the draft preferred alternative show any of the currently popular snowmobile areas closed the entire winter. The most restrictive closure in any of the alternatives is having areas open for snowmobiling from December 1 to February 15. How is this decision considered a component of any of the alternatives? In the EIS Chapter 2-19, the

top paragraph states: "Some changes have been made in the Preferred Alternative in the final EIS, in response to public comment and ID team review (see Preface, Summary of Changes in the FEIS Preferred Alternative). However these changes did not significantly affect outputs or the effects analysis." The public did not get a chance to comment on the areas closed to winter motorized use all winter because they were not in the draft Preferred Alternative nor in any alternative.

2. The Decision concerning snowmobile closures for the entire winter is not based on sound use data that supports the need and demand for more areas to be closed to snowmobiling. The purpose and need in the draft EIS stated that popular winter motorized areas will be kept open. The final decision reflects a complete reversal from this stated purpose and need. Other areas suggested for "quiet" winter recreation that would not have impacted popular snowmobiling areas were ignored such as Mt Alice and the area near Sunrise Inn in Cooper Landing. What data supports the overwhelming demand for more quiet areas? The EIS Appendix K, Agency, Native, Government, Elected Official Letters has a Kenai Peninsula Borough Resolution 2000-108 dated 11-21-00. This resolution references a Soldotna public meeting where over 200 people overwhelmingly supported no further snowmobile closures and wanted even more areas open and trailheads constructed. This resolution also references the Forest Service quote that they have not completed any scientific studies to support closing any of the existing trails or trailheads to snowmobiles because of any major ecological or social conflicts. The resolution was passed with a 9-0 vote. EIS 3-540: From the "Planning for the Future of the Chugach National Forest" and the "Your Community's Quality of Life" surveys. Under Forest Access – "A majority of respondents in 10 – 12 communities (excepting Valdez and Sterling) indicate a preference for the current amount of open area and season in the Forest for snowmobile use. More communities secondarily prefer increased access over decreased access. EIS 3-553: "Recreation and Tourism, Estimates of the PNV (Present Net Value) also were not calculated for recreation. The major reason for this is that the total amount of recreation use does not vary between the alternatives." Closing four major snowmobiling areas will vary winter recreation use drastically in the areas being closed. There will be more crowding in the few open areas left and less people going to the eastern Peninsula for snowmobiling. There is not any data that suggests that there will be equal dollars spent by the non-motorized groups as the motorized groups if one group is displaced by the other.

The Anchorage Snowmobile club has had representatives at most of the meetings during this long process. We have made several comments on the draft plans. We even had agreement between the different user groups such as The Alaska Center for the Environment and The Quiet Rights Coalition as to what would be the best overall plan for each of the groups. One example of an agreement that was completely ignored by the Forest Service was the area including the Skookum Glacier would be closed to winter motorized use for the early season one year and then the next year it would be closed during the late season. It seems that the Final Plan was arbitrary and capricious and we

are seeking relief. We want the Forest Service to use the Draft Preferred Alternative. This alternative was seen as being the most equitable amongst the groups involved.

Sincerely,

A handwritten signature in black ink, appearing to read "Pat Kuckertz", with a stylized flourish at the end.

Pat Kuckertz
President, Anchorage Snowmobile Club

cc. Regional Forester
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CERTIFIED MAIL

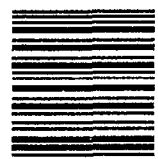


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